

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JASON DOUGLAS, individually and on behalf of all others similarly situated,)	
)	Case No. 14-cv-1741
Plaintiff,)	
)	Hon. Gary Feinerman
v.)	
)	Hon. Jeffrey Cole
THE WESTERN UNION COMPANY, a Delaware corporation,)	
)	
Defendant.)	

**DECLARATION OF RICKY BORGES
REGARDING NOTICE AND SETTLEMENT ADMINISTRATION**

I, Ricky Borges, hereby declare and state as follows:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. ("Epiq"), the Settlement Administrator for the above captioned case. I am familiar with the actions taken by Epiq with respect to the Settlement as described below, and am competent to testify about them if called upon to do so. This declaration is based upon my personal knowledge and information provided to me by associates or staff under my or common supervision, and review of the business records maintained by Epiq. It is accurate and truthful to the best of my knowledge.

2. Epiq was established in 1968 as a client services and data processing company. Epiq has been administering bankruptcies since 1985 and settlements since 1993, including settlements of class actions, mass tort litigation, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered more than 1,000 settlements, including some of the largest and most complex cases ever settled.

3. Epiq's class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment and implementation of notice fulfillment services, coordination with the United States Postal Service ("USPS"), notice website development and maintenance, dedicated phone lines with recorded information, receipt and processing of opt-outs, claims database management, claim adjudication, funds management, and award calculations and distribution services. Epiq works with the settling parties, the Court, and the Class Members in a neutral, facilitative role to implement settlement administration services based on the negotiated terms of a settlement.

OVERVIEW OF EPIQ'S RESPONSIBILITIES

4. Epiq was retained by Class Counsel and was approved by the Court to act as the Settlement Administrator. Epiq's responsibilities in connection with this Settlement include:

- a. Providing notice of the Settlement to the officials designated pursuant to Class Action Fairness Act "CAFA".
- b. Mailing direct notice by U.S. Mail to members of the Settlement Class for whom physical addresses were provided by December 23, 2015 (the "Notice Date");
- c. Emailing direct notice to members of the Settlement Class for whom e-mail addresses were provided by the Notice Date;
- d. Distributing and collecting Claim Forms;
- e. Collecting opt-outs and objections for submission to counsel and the Court; and
- f. Other tasks specified in the Settlement Agreement.

MAILING OF THE CAFA NOTICE

5. On November 5, 2015 Epiq sent 57 CAFA Notice Packages. The CAFA Notice was mailed by certified mail to 56 officials, including the Attorneys General of each of the 50 states, the District of Columbia and the U.S. Territory officials. The Notice was also sent by United Parcel Service to the Attorney General of the United States.

MAILING OF THE SETTLEMENT CLASS NOTICE

6. On November 3, 2015, Epiq received two data files with the names, mailing addresses and email addresses of 868,805 Settlement Class Members from The Western Union Company (the "List"). Upon receiving the data files, Epiq identified all Settlement Class Members with multiple accounts which resulted in 741,800 unique Settlement Class Members. Epiq also processed the names and addresses through the National Change of Address database prior to the mailed notice to ensure that we captured the most current available addresses. There were 603 Settlement Class Members for whom neither a physical address nor e-mail address was provided in the List.

7. On December 17, 2015, Epiq completed the direct notice via U.S. Mail to 741,197 Settlement Class Members for whom physical addresses were provided on the List. A copy of the direct mailed notice is attached to this Declaration in the form of Exhibit A. As of March 31, 2016, a total 125,652 mailed notices were returned to Epiq as undeliverable. For mailed notices that returned as undeliverable, Epiq undertook additional public record research to deliver the notices and remailed 63,820 notices via U.S. Mail.

8. On December 17, 2015, Epiq completed the direct notice via e-mail to 706,212 Settlement Class Members for whom physical e-mail addresses were provided on the List. A

copy of the direct emailed notice is attached to this Declaration in the form of Exhibit B. As of March 31, 2016 a total of 153,325 emailed notices were returned to Epiq as undeliverable.

9. As of March 31, 2016, Epiq mailed 3,043 Claim Forms by request. A copy of the mailed Claim Form is attached to this Declaration in the form of Exhibit C. Of the 3,043 Claim Forms mailed, Epiq mailed 1,872 Claim Forms to addresses there were not originally part of the List.

10. As of March 31, 2016, a total of 15,893 Settlement Class Members (or approximately 2.1% of the Settlement Class) have a direct notice that remains classified as undeliverable. If a Settlement Class Member's mailed direct notice returned as undeliverable but the emailed direct notice **did not** return as undeliverable, or vice-versa, the Settlement Class Member is not classified as undeliverable and thus not included in this figure.

OBJECTIONS AND OPT-OUTS

11. Any members of the Settlement Class who wished to object to the Settlement must have submitted a timely request to the Settlement Administrator, Class Counsel, and Defendant's Counsel and postmarked no later than sixty (60) days after the Notice Date. The Notice provided a deadline of February 22, 2016, for Settlement Class Members to object to the Settlement by mailing an objection to Epiq and counsel for the respective Parties. As of March 31, 2016, Epiq has received four (4) objections to the Settlement. A list of the individuals that objected is attached to this Declaration in the form of Exhibit D. Objector Bethany Price does not appear on the List.

12. Any members of the Settlement Class who wished to opt out or exclude himself or herself from the Settlement Class must have submitted a timely request for exclusion to the Settlement Administrator and postmarked no later than sixty (60) days after the Notice Date. The

Notice provided a deadline of February 22, 2016, for Settlement Class Members to exclude themselves from the Settlement by mailing an opt-out to Epiq. As of March 31, 2016, Epiq has received 22 timely opt-outs and zero late opt-outs. A list of the individuals that opted out is attached to this Declaration in the form of Exhibit E.

CLAIM FORMS RECEIVED

13. Any members of the Settlement Class who wished to file a Claim Form for settlement benefits must have submitted a timely Claim Form to the Settlement Administrator postmarked, or submitted electronically on the Settlement Website, no later than sixty (60) days after the Notice Date. The Notice provided a deadline of February 22, 2016, for Class Members to submit a Claim Form electronically on the Settlement Website or by U.S. Mail. As of March 31, 2016, Epiq has received a total of 54,316 timely Claim Forms, of which 53,056 were submitted electronically on the Settlement Website and 1,260 Claim Forms were submitted in paper form. An additional 31 Claim Forms were submitted in paper form after the February 22, 2016 deadline.

INFORMATION CENTER

14. On December 17, 2015, Epiq launched the Settlement Website, under the domain name www.WesternUnionTCPASsettlement.com, and a toll-free phone line, at 1-877-841-8156, to provide Settlement Class Members with resources to obtain additional information including how to submit a Claim Form or make inquiries about the Settlement. As of March 31, 2016, the Settlement Website was accessed by a total of 92,037 users and displayed 363,985 page views. As of March 31, 2016, the toll-free phone line received a total of 14,318 calls.

15. Epiq registered a post office box under the name of “Western Union Text Message Settlement, PO Box 3145, Portland, OR 97208-3145,” to receive communications from

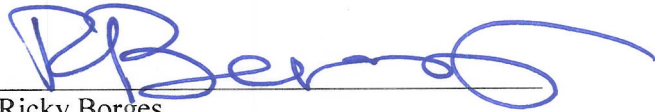
Settlement Class Members. The post office box address was published in the direct notice, on the Settlement Website, and in the Claim Form. As of March 31, 2016, Epiq received 2,767 correspondences, of which 259 correspondences were received by USPS mail and 2,508 correspondences were received by email.

NOTICE AND ADMINISTRATIVE COSTS

16. As of March 31, 2016, Epiq has accrued notice and administrative costs totaling \$481,142.09. Total costs will not exceed \$553,197 which is the notice and administrative cap amount based on the cost estimate that assumed a claims received rate that does not exceed 10% of the Settlement Class.

17. I declare under penalty of perjury under the laws of the United States and the State of Oregon that the foregoing is true and correct and that this declaration was executed on

April 4, 2016 in Beaverton, Oregon.



Ricky Borges
Project Manager
Epiq Class Action & Mass Tort Solutions, Inc.

EXHIBIT A

If You Were Sent a Text Message from The Western Union Company You May Be Entitled to a Payment from a Class Action Settlement.

A settlement has been reached in a class action lawsuit alleging that The Western Union Company ("Western Union") sent text messages to wireless telephone numbers without prior express written consent of the recipients in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA"). Western Union denies the allegations in the lawsuit, and the Court has not decided who is right.

Who's Included? Western Union's records show that you may be a member of the Settlement Class. The Settlement includes all persons in the United States who received one or more unsolicited text messages sent by or on behalf of Western Union between March 12, 2010 and November 10, 2015.

What Are the Settlement Terms? A Settlement Fund of \$8.5 million has been established to pay valid claims, attorneys' fees, service awards, costs, expenses and settlement administration.

How Can I Get a Payment? To get a payment, you must submit a claim using this 12-digit, unique identifier: <<XXXXXXXXXXXX>>. You can submit your claim online or by mail. Each Settlement Class Member who makes a claim will be entitled to an equal share in the Settlement Fund. Only one claim is allowed per Settlement Class Member. Settlement Class Members who submit a Valid Claim will receive \$250 or their equal share of the Settlement Fund, depending on the number of Valid Claims received. For example, if 1% of the Settlement Class submits Valid Claims, each Settlement Class Member would receive approximately \$706. If, however, 5% of the Settlement Class submits Valid Claims, each Settlement Class Member would receive approximately \$140. The final Cash Award will depend on the total number of Valid Claims filed by all Settlement Class Members. The Claim Deadline is **February 22, 2016**.

Your Other Options. If you **Stay In** the Settlement Class, you will be legally bound by the Settlement's terms, and you will release your claims against The Western Union, regardless of whether you file a Valid Claim. If you do not want to be legally bound by the Settlement, you must **Opt Out** of the Settlement by **February 22, 2016**. If you **Opt Out**, you will not be entitled to any payments, but you will retain the ability to file your own claim against The Western Union. If you do not **Opt Out**, you may **Object** to the Settlement by **February 22, 2016**. The detailed notice available on the Settlement Website explains how to **Opt Out** or **Object**. The Court will hold a Fairness Hearing on **April 8, 2016** to consider whether to approve the Settlement and a request for attorneys' fees of up to 35% of the Settlement Fund (approximately \$2,891,000) and an Incentive Award of \$5,000 to the Class Representative. You may appear at the Fairness Hearing, either yourself or through an attorney hired by you, but you don't have to. For more information, call 1-877-841-8156, visit the Settlement Website, or email info@WesternUnionTCPASettlement.com.

O3101 v.03 12.10.2015

WESTERN UNION TEXT MESSAGE SETTLEMENT
CABLE NEWS SYSTEMS, INC.
PO BOX 3145
PORTLAND, OR 97208-3145

**BARCODE NO
PRINT ZONE**

FIRST-CLASS MAIL
U.S. POSTAGE
PAID
Portland, OR
PERMIT NO. 2882

Legal Notice about a Class Action Settlement.

BARCODE NO PRINT ZONE

<NAME LINE 1>
<ADDRESS LINE 1>
<ADDRESS LINE 2>
<CITY, STATE ZIP>
<COUNTRY>

O3102 v.04 12.10.2015

Barcode No Print Zone

EXHIBIT B

If You Were Sent a Text Message from The Western Union Company, You May Be Entitled to a Payment from a Class Action Settlement.

A settlement has been reached in a class action lawsuit alleging that The Western Union Company (“Western Union”) sent text messages to wireless telephone numbers without prior express written consent of the recipients in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 (“TCPA”). Western Union denies the allegations in the lawsuit, and the Court has not decided who is right.

Who’s Included? Western Union’s records show that you may be a Settlement Class Member. The Settlement includes all persons in the United States who received one or more unsolicited text messages sent by or on behalf of Western Union between March 12, 2010 and November 10, 2015.

What Are the Settlement Terms? Western Union has agreed to pay \$8.5 million to create a Settlement Fund that will be used to pay cash payments to valid claimants, attorneys’ fees, a service award, and Notice and Administration Costs. Each Settlement Class Member who makes a claim will be entitled to an equal share in the Settlement Fund. Only one claim is allowed per Settlement Class Member. The final Cash Award will depend on the total number of Valid Claims filed by all Settlement Class Members.

How Can I Get a Payment? To get a payment, you must submit a claim **using this 12-digit, unique identifier: \$\$UniqueID\$\$**. You can quickly file a claim online at the [Settlement Website](#). You may also download a Claim Form and submit your claim via mail. The deadline to file a claim online is **11:59 p.m. PST on February 22, 2016**. If you send in a Claim Form by regular mail, it must be postmarked on or before **February 22, 2016**. Settlement Class Members who submit a Valid Claim will receive \$250 or their equal share of the Settlement Fund, depending on the number of Valid Claims received. For example, if 1% of the Settlement Class submits Valid Claims, each Settlement Class Member would receive approximately \$706. If, however, 5% of the Settlement Class submits Valid Claims, each Settlement Class Member would receive approximately \$140. The final Cash Award will depend on the total number of Valid Claims filed by all Settlement Class Members.

Your Other Options. If you **Stay In** the Settlement Class, you will be legally bound by the Settlement’s terms, and you will release your claims against Western Union, regardless of whether you file a Valid Claim. If you do not want to be legally bound by the Settlement, you must **Opt Out** of the Settlement by **February 22, 2016**. If you Opt Out, you will not be entitled to any payments, but you will retain the ability to file your own claim against Western Union. If you do not Opt Out, you may **Object** to the Settlement by **February 22, 2016**. The detailed notice available on the Settlement Website explains how to Opt Out or Object. The Court will hold a Fairness Hearing on **April 8, 2016** to consider whether to approve the Settlement and a request for attorneys’ fees of up to 35% of the Settlement Fund (approximately \$2,891,000) and an Incentive Award of \$5,000 to the Class Representative. You may appear at the Fairness Hearing, either yourself or through an attorney hired by you, but you don’t have to. For more information, call 1-877-841-8156, visit the [Settlement Website](#), or email info@WesternUnionTCPASettlement.com.

EXHIBIT C

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

If You Were Sent a Text Message from The Western Union Company, You May Be Entitled to a Payment from a Class Action Settlement.

A federal court directed this notice. This is not a solicitation from a lawyer.

- A settlement has been reached in a class action lawsuit alleging that The Western Union Company (“Western Union”) sent text messages to wireless telephone numbers without prior express written consent of the recipients in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 (“TCPA”). Western Union denies the allegations in the lawsuit, and the Court has not decided who is right.
- Settlement Class Members who submit Valid Claims will be entitled to a share of the Settlement Fund.
- Your legal rights are affected whether you act or do not act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM (February 22, 2016)	Submit a Claim Form seeking cash payment. Give up your right to be part of another lawsuit, arbitration or proceeding against Western Union for the same legal claims resolved by this Settlement.
OPT OUT OF THE SETTLEMENT (February 22, 2016)	Request to be excluded and receive no benefits from the Settlement. This is the only option that allows you to start or continue your own lawsuit against Western Union for the claims at issue in the Settlement.
OBJECT (February 22, 2016)	Remain in the Settlement and write to the Court about why you do not like the Settlement. If you would like benefits from the Settlement, you will need to file a Claim Form. Give up your right to be part of another lawsuit, arbitration or proceeding against Western Union for the same legal claims resolved by this Settlement.
GO TO A HEARING (April 8, 2016)	Remain in the Settlement and ask to speak in Court about the fairness of the Settlement. Give up your right to be part of another lawsuit, arbitration or proceeding against The Western Union for the same legal claims resolved by this Settlement.
DO NOTHING	Get no benefits. Give up your right to be part of another lawsuit, arbitration or proceeding against Western Union for the same legal claims resolved by this Settlement.

- These rights and options—and the deadlines to exercise them—are explained in this notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. If it does, and after any appeals are resolved, benefits will be distributed to those who submit qualifying Claim Forms. Please be patient.

**QUESTIONS? CALL 1-877-841-8156 OR VISIT
www.WesternUnionTCPASettlement.com**

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BASIC INFORMATION

1. Why is there a notice?

This notice is to inform you of the proposed Settlement of a class action lawsuit and about all of your rights and options before the Court decides whether to approve it. This notice describes the lawsuit, the proposed Settlement, your legal rights, what benefits are available and who can get them.

Judge Gary Feinerman of the United States District Court, Northern District of Illinois is overseeing the proposed Settlement in the matter of *Douglas v. The Western Union Co.*, Case No. 14-cv-1741 (the “Litigation”). The proposed Settlement will resolve the claims made against Western Union in the Litigation. The people who sued are called the “Plaintiff.” Western Union is the “Defendant.”

2. What is this Litigation about?

The lawsuit alleges that Western Union sent text messages to Plaintiff’s wireless telephone numbers without prior express written consent and in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 (“TCPA”), and it seeks statutory damages under the TCPA on behalf of the named Plaintiff and a proposed class of all individuals in the United States who received one or more unsolicited text messages from or on behalf of Western Union between March 12, 2010 and November 10, 2015.

Western Union denies each and every allegation of wrongdoing, liability and damages that were or could have been asserted in the Litigation and further denies that the claims in the Litigation would be appropriate for class treatment if the Litigation were to proceed through trial.

The Plaintiff’s Complaint and other case-related documents are posted on the Settlement Website, www.WesternUnionTCPASettlement.com. The Settlement resolves the lawsuit. The Court has not decided who is right.

3. What is the Telephone Consumer Protection Act?

The TCPA is a federal law that restricts telephone solicitations and the use of certain automated telephone equipment, such as automatic dialing systems, artificial or prerecorded voice messages, SMS text messages, and fax machines.

4. Why is this a class action?

In a class action, one or more people called “Class Representatives” (in this case, Plaintiff Jason Douglas) sue on behalf of themselves and other similarly situated people. Together, all the people with similar claims are members of a “Settlement Class.”

5. Why is there a settlement?

The Court has not decided in favor of Plaintiff or Western Union. Instead, both sides have agreed to a settlement. By agreeing to the Settlement, the Parties avoid the costs and uncertainty of a trial, and, if the Settlement is approved by the Court, Settlement Class Members will receive the benefits described in this notice. The proposed Settlement does not mean that any law was broken or that Western Union did anything wrong. Western Union denies all legal claims in this case. Plaintiff and his lawyers think the proposed Settlement is best for everyone who is affected.

WHO IS PART OF THE SETTLEMENT?

6. Who is included in the Settlement?

The Settlement includes all persons in the United States who received one or more unsolicited text messages sent by or on behalf of Western Union between March 12, 2010 and November 10, 2015. These people are called the “Settlement Class.”

Excluded from the Settlement Class are (a) Western Union, its officers, its directors; (b) Class Counsel; and (c) the Judges who have presided over the Litigation and their immediate family members.

**QUESTIONS? CALL 1-877-841-8156 OR VISIT
www.WesternUnionTCPASettlement.com**

7. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are in the Settlement Class or have any other questions about the Settlement, visit the Settlement Website at www.WesternUnionTCPASettlement.com or call the toll-free number 1-877-841-8156. You also may send questions to the Settlement Administrator at Western Union Text Message Settlement, C/O Epiq Systems, Inc., PO Box 3145, Portland, OR 97208-3145.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

Western Union has agreed to pay \$8.5 million to create a "Settlement Fund." The Settlement Fund will be used to pay all Settlement costs, including Notice and Administration Costs, the Attorneys' Fee Award, and Incentive Award to the Class Representative. The remaining "Net Settlement Fund" will be distributed as cash payments to Settlement Class Members who submit Valid Claims. The cash payments will be approximately \$250 or an equal share of the Settlement Fund, depending on the number of Valid Claims received. For example, if 1% of the Settlement Class submits Valid Claims, each Settlement Class Member would receive approximately \$706. If, however, 5% of the Settlement Class submits Valid Claims, each Settlement Class Member would receive approximately \$140. Each Settlement Class Member may only file one claim and receive only one cash payment.

9. How do I file a claim?

To get a payment, you must submit a claim using your 12-digit, unique identifier provided in the postcard or email notice you received. If you qualify for a Cash Award, you must complete and submit a valid Claim Form. You can submit your Claim Form online at www.WesternUnionTCPASettlement.com. The deadline to file a claim online is **11:59 p.m. PST on February 22, 2016**.

You may also submit your Claim Form via regular mail. Claim Forms submitted by mail must be postmarked on or before **February 22, 2016** to:

Western Union Text Message Settlement
C/O Epiq Systems, Inc.
PO Box 3145
Portland, OR 97208-3145

No matter which method you choose to file your Claim Form, please read the Claim Form carefully and provide all the information required. Only one Claim Form per Settlement Class Member may be submitted.

10. When will I receive my payment?

Payments to valid claimants will be made only after the Court grants Final Approval to the Settlement and after any appeals are resolved (*see* "Fairness Hearing" below). If there are appeals, resolving them can take time. Please be patient.

EXCLUDING YOURSELF FROM THE SETTLEMENT

11. How do I get out of the Settlement?

If you do not want benefits from the Settlement, and you want to keep any right you might have to sue Western Union about the issues in this case, then you must take steps to get out of the Settlement. This is called excluding yourself or "opting out" of the Settlement Class.

To exclude yourself from the Settlement, you must send a letter or other written document by mail to:

Western Union Text Message Settlement
C/O Epiq Systems, Inc.
PO Box 3145
Portland, OR 97208-3145

**QUESTIONS? CALL 1-877-841-8156 OR VISIT
www.WesternUnionTCPASettlement.com**

Your request to be excluded from the Settlement must be personally signed by you and contain a statement that you are a member of the Settlement Class but desire to be excluded from it.

Your exclusion request must be postmarked no later than **February 22, 2016**. You cannot ask to be excluded on the phone, by email, or at the website.

You may opt out of the Settlement Class only for yourself. So-called “mass” or “class” opt outs, whether filed by third parties on behalf of a “mass” or “class” of members of the Settlement Class or multiple members of the Settlement Class where no personal statement has been signed by each and every individual member of the Settlement Class, are not allowed.

12. If I do not exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right you might have to sue Western Union for legal claims that the Settlement resolves. You must exclude yourself from the Settlement Class in order to try to maintain your own lawsuit. If you start your own lawsuit, you will have to hire your own lawyer, and you will have to prove your claims.

13. What am I giving up to stay in the Settlement Class?

Unless you exclude yourself from the Settlement, you cannot sue or be part of any other lawsuit against Western Union about the issues in this case, including any existing litigation, arbitration, or proceeding. Unless you exclude yourself, all of the decisions and judgments by the Court will bind you. If you file a Claim Form for benefits or do nothing at all, you will be releasing Western Union from all of the claims described and identified in Section IX of the Settlement Agreement.

The Settlement Agreement is available at www.WesternUnionTCPASettlement.com. The Settlement Agreement provides more detail regarding the Release and describes the Released Claims with specific descriptions in necessary, accurate legal terminology, so read it carefully. You can talk to the law firm seeking to represent the Settlement Class and listed in Question 15 for free, or you can, at your own expense, talk to your own lawyer if you have any questions about the Released Claims or what they mean.

14. If I exclude myself, can I still get a payment?

No. You will not get a payment from the Settlement Fund if you exclude yourself from the Settlement.

THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in the case?

The Court has appointed Joseph J. Siprut of Siprut PC as “Class Counsel” to represent all members of the Settlement Class.

You will not be charged for this lawyer’s services. The Attorneys’ Fee Award will be paid directly from the Settlement Fund. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

16. How will the lawyers be paid?

Class Counsel intend to request up to thirty-five percent (35%) (approximately \$2,891,000) of the value of the Settlement for attorneys’ fees, plus reimbursement of reasonable, actual out-of-pocket expenses incurred in the Litigation. The fees and expenses awarded by the Court will be paid out of the Settlement Fund. The Court will decide the amount of fees and expenses to award.

Class Counsel also will request that an Incentive Award of \$5,000 be paid from the Settlement Fund to the Class Representative for his service as representative on behalf of the whole Settlement Class.

OBJECTING TO THE SETTLEMENT

17. How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member (and do not exclude yourself from the Settlement Class), you can object to any part of the Settlement. To object, you must submit a letter or other written document that includes the following:

- 1) A heading that includes the case name and case number, *Douglas v. The Western Union Company*, Case No. 14-cv-1741;
- 2) Your name, address, telephone number and, if represented by counsel, the name, bar number, address and telephone number of your counsel;
- 3) A signed declaration stating, under penalty of perjury, that you are a member of the Settlement Class;
- 4) A statement of all your objections to the Settlement including your legal and factual basis for each objection; and
- 5) A statement of whether you intend to appear at the Fairness Hearing, either with or without counsel, and if with counsel, the name, bar number, address, and telephone number of your counsel who will attend.

You must file your objection with the Court and mail or email your objection to each of the following postmarked or emailed by **February 22, 2016**:

Settlement Administrator Western Union Text Message Settlement C/O Epiq Systems, Inc. PO Box 3145 Portland, OR 97208-3145	Class Counsel Joseph J. Siprut Siprut PC 17 N. State Street Suite 1600 Chicago, IL 60602	Defendant's Counsel Mark S. Mester Kathleen P. Lally Latham & Watkins LLP 330 N. Wabash Avenue Suite 2800 Chicago, IL 60611
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18. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself. Excluding yourself is telling the Court that you do not want to be part of the Settlement. If you exclude yourself, you have no basis to object to the Settlement because it no longer affects you.

THE FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement and any requests for fees and expenses ("Fairness Hearing").

19. When and where will the Court decide whether to approve the Settlement?

The Court has scheduled a Fairness Hearing on **April 8, 2016 at 10:00 a.m.**, at the Everett McKinley Dirksen United States Courthouse, located at 219 South Dearborn Street, Courtroom 2125, Chicago, Illinois 60604. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.WesternUnionTCPASettlement.com for updates. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider the requests by Class Counsel for attorneys' fees and expenses and for an Incentive Award to the Class Representative. If there are objections, the Court will consider them at that time. After the hearing, the Court will decide whether to approve the Settlement. It is unknown how long these decisions will take.

20. Do I have to attend the hearing?

No. Class Counsel will answer any questions the Court may have. But, you are welcome to attend the hearing at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you submitted your written objection on time, to the proper addresses, and it complies with the other requirements set forth above, the Court will consider it. You also may pay your own lawyer to attend the hearing, but it is not necessary.

21. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, your filed objection must include a statement of whether you intend to appear at the Fairness Hearing (*See* question 17 above).

You cannot speak at the hearing if you exclude yourself from the Settlement.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you are a member of the Settlement Class and do nothing, you will not get benefits from the Settlement. And, unless you exclude yourself, you will be bound by the judgment entered by the Court. This means you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit or proceeding against Western Union about the claims at issue in this case.

GETTING MORE INFORMATION

23. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. For a complete, definitive statement of the Settlement terms, refer to the Settlement Agreement at www.WesternUnionTCPASettlement.com. You also may write with questions to the Settlement Administrator at Western Union Text Message Settlement, C/O Epiq Systems, Inc., PO Box 3145, Portland, OR 97208-3145, or call the toll-free number, 1-877-841-8516.

CLAIM FORM

Douglas v. The Western Union Company, Case No. 1:14-cv-01741
(N.D. Ill. filed March 12, 2014)

WESTERN UNION TEXT MESSAGE SETTLEMENT
C/O EPIQ SYSTEMS, INC., PO BOX 3145, PORTLAND, OR 97208-3145

Your Signed Claim Form Must Be Completed, Submitted Online or Mailed and Postmarked No Later Than February 22, 2016.

If You Do Not Submit a Claim Form by February 22, 2016, You Will Not Receive the Benefits Described in the Class Notice. Please Read This Entire Form Carefully.

If you received one or more unsolicited text messages sent by or on behalf of Western Union between March 12, 2010 and November 10, 2015, you may be entitled to compensation if you complete this Claim Form and submit it either online or by mail no later than **February 22, 2016**.

First Name

MI

Last Name

Street Address

City

State

ZIP Code

Mobile Phone Number

 - -

Email Address

Date of Unsolicited Text Message (MM-DD-YYYY)

 - -

Unique Identifier (in the postcard or email notice you received)

By submitting this Claim Form and signing below, I declare under penalty of perjury that I received an unsolicited text message sent by or on behalf of Western Union between March 12, 2010 and November 10, 2015 and that all information in this Claim Form is true and correct to the best of my knowledge.

Signature:

Date:

 - -

MM

DD

YYYY

Print Name: _____

Your claim will be submitted to the Settlement Administrator for review. If accepted, you will be mailed a check representing your share of the Settlement Fund. This process takes time, so please be patient. Please keep a copy of your completed Claim Form for your records and ensure that you keep your current address on file with the Settlement Administrator.

EXHIBIT D

Douglas v. The Western Union Co.

Case No. 14-cv-1741

Requests to Object

	First Name	Middle	Last Name	Objection #
1	BETHANY	C	PRICE	600000001
2	PATRICK	S	SWEENEY	600000002
3	PAMELA		SWEENEY	600000003
4	JOHN		KNOTT	600000005

EXHIBIT E

Douglas v. The Western Union Co.

Case No. 14-cv-1741

Requests For Exclusions

	First Name	Middle	Last Name	Opt Out #
1	DEBRA	A	VENA	900000010
2	LOLA		NELSON	900000004
3	RENELLE		SCHAFER	900000003
4	LYNDA	M	STAGGS	900000022
5	MUSTAFA	G	YUKSEK	900000009
6	ROBERT	L	CLARK	900000006
7	MARLON		STUART	900000015
8	LORETA	W	WHORTON	900000012
9	KRISTINE ANN	A	NIERE	900000005
10	KATHRYN		WESTRUM	900000020
11	DAWN		EHALT	900000017
12	CRUZ		MRSTIK	900000007
13	YING		DONG	900000014
14	VICTOR		MONJARAS	900000021
15	DEAN		SWANSON	900000011
16	JAMES		RYAN	900000001
17	DEBRA		GLENN	900000008
18	PATTY		STUART	900000016
19	KOUTOUBOU	A	BADJI	900000018
20	BARBARA	J	BELL	900000013
21	JOSHUA		ROLLINS	900000002
22	TIFFANY		CORLEY	900000019